

Exhibit C

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
IN RE NEW YORK COUNTY
ASBESTOS LITIGATION
-----X

This document Relates to:
CHRISTIAN F. HOLINKA

Plaintiff,

-against-

A.W. CHESTERTON COMPANY, et al.,

Defendants.
-----X

NYCAL
I.A.S. Part 39
(Freedman, J.)

Index No. 114120-06

**BAXTER HEALTHCARE
CORPORATION'S RESPONSES
TO PLAINTIFF'S PRODUCT
IDENTIFICATION
INTERROGATORIES AND
DOCUMENT REQUESTS**

Defendant Baxter Healthcare Corporation ("Baxter"), erroneously sued herein as "Baxter Healthcare Corporation, individually and as successor in interest to American Hospital Supply Corp. and American Scientific Products," by and through its attorneys, Drinker Biddle & Reath LLP, responds to Plaintiff's Product Identification Interrogatories and Document Requests (collectively, the "Requests"), as follows:

GENERAL OBJECTIONS

1. Baxter objects to the extent the Requests are vague, ambiguous, overly broad, and unduly burdensome.
2. Baxter objects to the extent the Requests purport to require a response on behalf of any individual or entity other than Baxter.
3. Baxter objects to the extent the Requests purport to require any greater or different response than that required by the New York Civil Practice Law and Rules, the NYCAL Amended Case Management Order, or other applicable rules.
4. Baxter objects to the extent the Requests call for the production of documents containing trade secret, confidential, and/or proprietary information.

5. Baxter objects to the extent the Requests call for the production of documents that are protected from disclosure by the attorney-client privilege, attorney work product doctrine, or other applicable privileges.

6. Baxter objects to the extent that the Requests assume facts not established, including that this defendant made, sold, shipped, distributed, installed, or otherwise provided asbestos containing products.

RESPONSES TO REQUESTS

Baxter incorporates its General Objections into each respective Response below.

REQUEST NO. 1:

State if you are aware through information in your own files or in the possession of your local attorney(s), whether any asbestos containing product sold, shipped, distributed, contracted for and/or manufactured by you was at the sites listed on the attached Chart A from Plaintiff's Answers to Defendants' Interrogatories and Request for Production of Documents, and/or was present at sites identified by the plaintiff or any of his co-workers at his/their depositions.

For each site which you are aware that such products were present, specify the type of product, amount of product and time frame in which such products were present.

RESPONSE:

Baxter incorporates the General Objections and further states that neither the plaintiff nor any of his co-workers (if any) have been deposed in this action. Subject to and without waiving these objections, Baxter responds: Baxter has no records of any direct sales to the alleged exposure sites listed on the Chart A attached to Plaintiff's Answers to Defendants' Interrogatories and Request for Production of Documents during the relevant time periods. Baxter further states that it is not aware that any product sold, shipped, distributed, contracted for and/or manufactured by Baxter was otherwise present at the alleged exposure sites during the relevant time periods.

REQUEST NO. 2:

Identify any documents, invoices, information stored in electronic form such as word processing files and computer databases, photographs, books, contracts, agreements, drawings, approvals, delivery tickets, depositions of past or current employees, studies, memoranda, statements, your own pleadings, stipulations, promotional material, reports, telegrams and any other written, printed, graphic or audio materials of any kind or description, including all non-identical copies thereof, in your possession or control or in the possession and control of your local attorney(s), that indicate that any asbestos containing product manufactured, sold, delivered, shipped, rebranded, contracted for, distributed, installed or retailed by you, your successor or predecessor entities, subdivision or affiliates were present at the sites specified in Question one.

RESPONSE:

Baxter incorporates the General Objections. Subject to and without waiving these objections, Baxter responds: None.

Dated: New York, New York
February 6, 2007

Daniel B. Carroll
DRINKER BIDDLE & REATH LLP
Attorneys for Defendant
Baxter Healthcare Corporation
140 Broadway, 39th Floor
New York, New York 10005
(212) 248-3140

STATE OF NEW JERSEY)
) ss:
COUNTY OF MORRIS)

Timothy J. Fraser, being duly sworn, deposes and says:

I am over the age of eighteen and I am not a party to this action. On February 7, 2007, I caused a true and correct copy of the foregoing Baxter Healthcare Corporation's Responses to Plaintiff's Product Identification Interrogatories and Document Requests to be served upon the following via Federal Express:

Benjamin Darche, Esq.
Weitz & Luxenberg
180 Maiden Lane
New York, New York 10038-4925
(counsel for plaintiff)

On February 7, 2007, I caused a true and correct copy of the foregoing Baxter Healthcare Corporation's Responses to Plaintiff's Product Identification Interrogatories and Document Requests to be served upon the following via first class mail with adequate postage affixed thereto:

Julie Evans, Esq.
Wilson, Elser, Moskowitz, Edelman & Dicker
150 East 42nd Street
New York, New York 10017-5639
(counsel for A.W. Chesterton Co.)

Judith Yavitz, Esq.
Anderson, Kill, Olick & Oshinsky
1251 Avenue of the Americas
New York, New York 10020-1000
(counsel for Amchem Products, Inc. and Certain Teed Corporation)

Theodore Eder, Esq.
Segal McCambridge Singer & Mahoney
830 Third Avenue, Suite 400
New York, New York 10022
(counsel for Anchor Packing Co., Inc. and Garlock Sealing Technologies LLC)

Cori L. Leavitt, Esq.
Malaby, Carlisle & Bradley LLC
150 Broadway
New York, New York 10038
*(counsel for Aqua-Chem, Inc., CBS Corporation, Premier Refractorie
Inc. and J.H. France Refractories Co.)*

Lawrence McGivney, Esq.
McGivney & Kluger, P.C.
80 Broad Street, 23rd Floor
New York, New York 10004
(counsel for Beckman Coulter, Inc.)

Joseph Colao, Esq.
Leader & Berkon LLP
630 3rd Avenue, 17th Floor
New York, New York 10017
(counsel for E.I. DuPont de Nemours and Company)

Marc S. Gaffrey, Esq.
Hoagland, Longo, Moran, Dunst & Doukas
40 Patterson Street
P.O. Box 480
New Brunswick, New Jersey 08903
(counsel for Fisher Scientific International Inc.)

Lisa M. Pascarella, Esq.
Pehlivanian, Braaten & Pascarella, LLC
2430 Route 34
Manasquan, New Jersey 08736
(counsel for Ingersoll-Rand Co.)

Jennifer Darger, Esq.
Darger & Errante LLP
116 East 27th Street, 12th Floor
New York, New York 10016
(counsel for Lennox Industries, Inc.)

Linda Yassky, Esq.
Sonnenschein Nath & Rosenthal
1221 Avenue of the Americas
New York, New York 10020
(counsel for Rapid American Corporation)

Ian Grodman, Esq.
Law Offices of Ian R. Grodman, P.C.
515 Valley Street, Suite 170
Maplewood, New Jersey 07040
(counsel for Rheem Manufacturing Company, Inc.)

Jonathan E. Polonsky, Esq.
Thelen Reid & Priest LLP
875 Third Avenue
New York, New York 10022
(counsel for Univar USA, Inc.)

David F. Abernathy, Esq.
Drinker Biddle & Reath LLP
One Logan Square
18th & Cherry Streets
Philadelphia, Pennsylvania 19103-6996
(counsel for VWR International, Inc.)

this being their last known address.

Timothy J. Fraser

Sworn to and subscribed before me on
This ____ day of February, 2007

Notary Public

Exhibit D

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X

CHRISTIAN F. HOLINKA,

Plaintiff(s),

-against-

A.W. CHESTERTON COMPANY, et al.,

Defendants.

-----X

Index No.: 114120-06

**MANORCARE HEALTH
SERVICES, INC.'S
RESPONSES TO
PRODUCT
IDENTIFICATION
INTERROGATORIES
AND DOCUMENT
REQUESTS**

NOW COMES Defendant ManorCare Health Services, Inc., by and through its attorneys,
Reed Smith LLP, and in answer of Plaintiff's Product Identification Interrogatories and
Document Requests, states as follows:

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

ManorCare Health Services, Inc. ("ManorCare" or "Defendant") has not fully completed
its investigation or discovery relating to this action or its preparation for trial. All of the
responses contained herein are based solely upon the information which is presently available
and specifically known to ManorCare. The discovery in this matter is continuing and such
further discovery may lead to additional responses in the future.

All the responses are given without prejudice to ManorCare's right to produce or
introduce evidence of any subsequently discovered documents, facts, information, or contentions
which it may later obtain or recall. ManorCare, therefore, reserves its right to supplement and/or
amend any and all responses as additional facts and/or documents are discovered, analyses are
made, and investigation and research is completed.

Each response herein is given subject to all appropriate objections, including but not
limited to, competence, relevance, materiality, hearsay, lack of foundation, admissibility, form of

the question, and the exclusion of any statement contained herein if any portion of the requests were asked for, or if any statement contained herein was made by, a witness present and testifying in Court. Such objections and rounds are therefore reserved and may be interposed at the time of trial. ManorCare reserves the right to make any evidentiary objections to the introduction into evidence at trial of this case and otherwise of any of these responses or documents produced in response to the demands.

ManorCare objects to each and every interrogatory to the extent that it requires the disclosure of information that (a) was prepared in anticipation of litigation; (b) constitutes privileged attorney-client material; (c) constitutes attorney work product; (d) is subject to any other privilege; and/or (e) is otherwise protected from disclosure.

INTERROGATORIES

1. State if you are aware through information in your own files or in the possession of your local attorney(s), whether any asbestos containing product, sold, shipped, distributed, contracted for and/or manufactured by you was at the sites listed on the attached Chart A from Plaintiff's Answers to Defendants' Interrogatories and Request for Production of Documents, and/or was present at sites identified by the plaintiff or any of his co-workers at his/their depositions. For each site that you are aware that such products were present, specify the type of product, amount of product and time frame in which such products were present.

ANSWER:

ManorCare objects to this interrogatory as seeking information protected by the attorney-client and/or attorney work product doctrine. Subject to and without waiving its objections, ManorCare responds that after a diligent search and reasonable inquiry, ManorCare has no record or information that it, or any of its alleged predecessor entities, supplied any asbestos-containing products to the sites listed on the attached Chart A from Plaintiff's Answers to Defendant's Interrogatories and Request for Production of Documents. Similarly, ManorCare

has no record or information that it, or any of its alleged predecessor entities, supplied any asbestos-containing products to the sites identified by Plaintiff during his deposition.

2. Identify any documents, invoices, information stored in electronic form such as word processing files and computer databases, photographs, books, contracts, agreements, drawings, approvals, delivery tickets, depositions of past or current employees, studies, memoranda, statements, your own pleadings, stipulations, promotion material, reports, telegrams and any other written, printed, graphic or audio materials of any kind or description, including all non-identical copies thereof, in your possession or control or in the possession and control of your local attorney(s), that indicate that any asbestos containing product manufactured, sold, delivered, shipped, rebranded, contracted for, distributed, installed or retailed by you, your successor or predecessor entities, subdivision or affiliates were present at the sties specified in Question one.

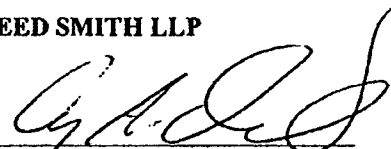
ANSWER:

See ManorCare's answer to Interrogatory No. 1, which is incorporated herein by reference.

Dated: Princeton, New Jersey
March 12, 2007

REED SMITH LLP

By:



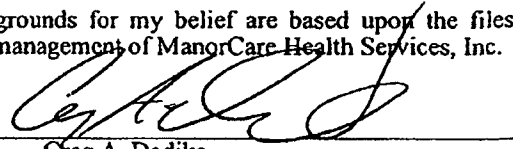
Greg A. Dadika, Esq.
John J. Zefutic, Jr., Esq.
136 Main Street - Suite 250
Princeton Forrestal Village
Princeton, New Jersey 08540
(609) 987-0050
Counsel for Defendant
ManorCare Health Services, Inc.

VERIFICATION

STATE OF NEW JERSEY)
)ss:
COUNTY OF MERCER)

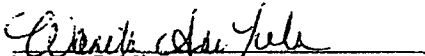
Greg A. Dadika, Esquire, being duly sworn deposes and says: That I am an associate at the firm of Reed Smith LLP, attorneys for Defendant ManorCare Health Services, Inc., that I have read the foregoing responses to discovery and know that the contents thereof are true to the best of my knowledge, except as to those matters therein stated to be alleged upon information and belief, and that as to those matters I believe them to be true. The reason for this verification is made by counsel and not made by ManorCare is that ManorCare is not located in the county where counsel's offices are located.

The basis of my information and the grounds for my belief are based upon the files contained in my office, and conversations with management of ManorCare Health Services, Inc.



Greg A. Dadika

Subscribed and sworn
To me, this 12th day of
March 2007



Notary Public

WANDA ANN TRELA
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 12/8/2011

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X

Index No.: 114120-06

CHRISTIAN F. HOLINKA,

AFFIDAVIT OF SERVICE

Plaintiff(s),

-against-

A.W. CHESTERTON COMPANY, et al.,

Defendants.

-----X

STATE OF NEW JERSEY)

)ss:

COUNTY OF MERCER)

GREG A. DADIKA, being duly sworn, deposes and says:

1. I am an attorney at law license to practice in the State of New York and an associate in the law firm of Reed Smith LLP, attorneys for Defendant ManorCare Health Services, Inc. ("ManorCare") in the above-captioned action;

2. I am more than 18 years of age;

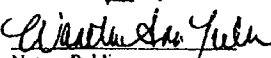
3. I am not a party to this action;

4. I am a resident of the State of New Jersey; and

5. That on this 12th day of March, 2007, deponent caused to be served Defendant ManorCare Health Services, Inc.'s Responses to Product Identification Interrogatories and Document Requests upon all counsel of record as exhibited in the attached service list.


Greg A. Dadika

Subscribed and sworn
To me, this 12th day of March, 2007


Notary Public

WANDA ANN TRELA
NOTARY PUBLIC - NEW JERSEY
Commission Expires 12/31/2011

Exhibit

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
This Document Relates To:

Index No.: 114120-06

CHRISTIAN HOLINKA,

Plaintiff

-against-

A.W. CHESTERTON COMPANY, et al,

Defendants
-----X

FISHER SCIENTIFIC COMPANY
L.L.C.'S RESPONSES TO
PRODUCT IDENTIFICATION
INTERROGATORIES

**GENERAL OBJECTIONS TO INTERROGATORIES AND
REQUEST FOR DOCUMENT PRODUCTION**

Fisher Scientific Company L.L.C. (hereinafter "Fisher Scientific" or "Defendant") objects to these interrogatories and requests to the extent that they seek information beyond that relevant to the facts of this case and the product purportedly at issue herein.

Fisher Scientific generally objects to Plaintiff's interrogatories and document requests insofar as they seek information and documents that (i) were prepared for or in anticipation of litigation; (ii) constitute privileged attorney - client material; and/or (iii) constitute privileged attorney-work product or are otherwise protected from disclosure.

Fisher Scientific generally objects to Plaintiff's interrogatories and document requests on the ground that they assume matters not established by the evidence.

Fisher Scientific generally objects to Plaintiff's interrogatories and document requests insofar as they seek confidential and/or proprietary information. Fisher Scientific will provide responses which contain confidential or proprietary information once the parties agree upon the terms and conditions of a protective order governing the use of such documents and information.

Fisher Scientific submits these responses in response to Plaintiff's interrogatories and document

requests without conceding the relevancy or materiality of the subject matter of any interrogatory and without prejudice to Fisher Scientific's right to object to further discovery, or to object to the admissibility of any additional proof on the subject matter of any response, at the time of trial.

INTERROGATORIES

1. State if you are aware through information in your own files or in the possession of your local attorney(s), whether any asbestos-containing product sold, shipped, distributed, contracted for and/or manufactured by you was at the sites listed on the attached Chart A from Plaintiff's Answers to Interrogatories and Request for Production of Documents, and/or was present at sites identified by the plaintiff or any of his co-workers at his/their depositions.

For each site which you are aware that such products were present, specify the type of product, amount of product and time frame in which such products were present.

RESPONSE: See General Objections. Defendant further objects to this Interrogatory as vague, overly broad, calls for speculation and invades the attorney-client and work product privileges. Subject to and without waiving these objections, Defendant responds that due to the passage of time, it has no information that any product sold, distributed or manufactured by it was present at the period specified at any of the job sites listed in Chart "A," if such information ever existed. As discovery in this matter is continuing, Defendant reserves its right to supplement this response upon discovery of relevant information.

2. Identify all documents, invoices, including information stored in electronic form such as word processing files and computer databases, photographs, books, contracts, agreements, drawings, approvals, delivery tickets, depositions of past or current employees, studies, memoranda, statements, your own pleadings, stipulations, promotional material, reports, telegrams and any other written, printed, graphic or audio materials of any kind or description, including all non-identical

copies thereof, in your possession, custody or control, or in the possession, custody or control of your local attorney(s), that indicate that any asbestos-containing product manufactured, sold, delivered, shipped, rebranded, contracted for, distributed, installed or retailed by you, your successor or predecessor entities, subdivision or affiliates were present at the job sites specified in Question one.

RESPONSE: See General Objections. Defendant further objects to this Interrogatory as vague, overly broad, calls for speculation and invades the attorney-client and work product privileges. Subject to and without waiving these objections, Defendant responds that due to the passage of time, it has no information that any product sold, distributed or manufactured by it was present at the period specified at any of the job sites referred to in Question 1, if such information ever existed. As discovery in this matter is continuing, Defendant reserves its right to supplement this response upon discovery of relevant information.

Dated: February 27, 2007

HOAGLAND, LONGO, MORAN,
DUNST & DOUKAS
156 Williams Street - 11th Floor
New York, New York 10035
Attorneys for Defendant
Fisher Scientific Company L.L.C.

SHAZIA CHAUDHRI DEWIT, ESQ.

02/27/2007 16:35 4124988885

FISHER LEGAL

PAGE 02/03

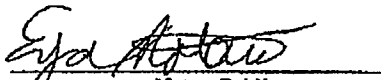
CERTIFICATION

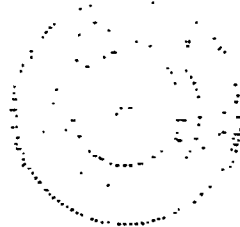
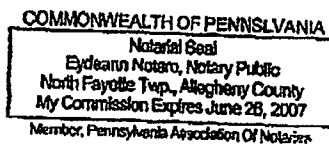
I certify that the foregoing statements made by me in the attached Responses to Plaintiff's Product Identification and Document Requests are true and correct to the best of my knowledge, information and belief. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment for contempt of Court.

DATED: 27 February 2007


Robert J. Forte

Sworn to before me and subscribed in my
Presence this 27th day of February, 2007


Notary Public



02/27/2007 16:35 4124908885

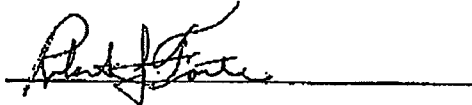
FISHER LEGAL

PAGE 03/03

CERTIFICATION IN LIEU OF OATH OR AFFIDAVIT

I hereby certify that the foregoing statements made by me in the attached interrogatories are true to the best of my knowledge. The information supplied in these answers is not based solely on the knowledge of the executing party, but includes knowledge of the company, its party, its agents, its servants, employees and attorneys unless privileged. The word usage and sentence structure may be that of the attorney or counsel assisting in the preparation of these answers to interrogatories and thus does not necessarily purport to be the precise language of the executing party.

Furthermore, I hereby certify that the copies of the reports and documents annexed hereto are exact and complete copies of the entire report or reports; that the existence of other documents and reports, either written or oral, are unknown to me or the answering party. If such documents become later known or available, I shall serve them promptly on the propounding party. I am aware that if any of the foregoing statements made by me are willfully false, the executing party is subject to punishment.



On behalf Fisher Scientific Company L.L.C.

Dated: February 27, 2007

Exhibit E

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In Re: NEW YORK CITY ASBESTOS LITIGATION :

Index No. 114120-06

This Document Relates To:

CHRISTIAN F. HOLINKA,

Plaintiff

-against-

A.W. CHESTERTON COMPANY, et al.

Defendants.

: VWR International, Inc.'s
: Responses to Plaintiff's
: Product Identification
: Interrogatories And Document
: Requests

NOW COMES Defendant VWR International, Inc., by and through its attorneys,
DRINKER BIDDLE & REATH LLP, and in answer to Plaintiff's Product Identification
Interrogatories And Document Requests, states as follows:

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

VWR International, Inc. ("VWR" or "Defendant") has not fully completed its investigation or discovery relating to this action or its preparation for trial. All of the responses contained herein are based solely upon the information which is presently available and specifically known to VWR. The discovery in this matter is continuing and such further discovery may lead to additional responses in the future.

All the responses are given without prejudice to VWR's right to produce or introduce evidence of any subsequently discovered documents, facts, information, or contentions which it may later obtain or recall. VWR, therefore, reserves its right to supplement and/or amend any and all responses as additional facts and/or documents are discovered, analyses are made, and investigation and research is completed.

Each response herein is given subject to all appropriate objections, including but not limited to, competence, relevance, materiality, hearsay, lack of foundation, admissibility, form of the question, and the exclusion of any statement contained herein if any portion of the requests were asked for, or if any statement contained herein was made by, a witness present and testifying in Court. Such objections and grounds are therefore reserved and may be interposed at the time of trial. VWR reserves the right to make any evidentiary objections to the introduction

into evidence at trial of this case and otherwise of any of these responses or documents produced in response to the demands.

VWR objects to each and every interrogatory to the extent that it requires the disclosure of information that (a) was prepared in anticipation of litigation; (b) constitutes privileged attorney-client material; (c) constitutes attorney work product; (d) is subject to any other privilege; and/or (e) is otherwise protected from disclosure.

INTERROGATORIES

Q1. State if you are aware through information in your own files or in the possession of your local attorney(s), whether any asbestos containing product, sold, shipped, distributed, contracted for and/or manufactured by you was at the sites listed on the attached Chart A from Plaintiff's Answers to Defendant's Interrogatories and Request for Productions of Documents, and/or was present at the sites identified by the plaintiff or any of his co-workers at his/their depositions. For each site which you are aware that such products were present, specify the type of product and time frame in which such products were present.

ANSWER

VWR objects to this interrogatory as seeking information protected by the attorney-client and/or attorney work product doctrine. Subject to and without waiving its objections, VWR responds that after a diligent search and reasonable inquiry, VWR has no record or information that it supplied any asbestos-containing products to the sites listed on the attached Chart A from Plaintiff's Answers to Defendant's Interrogatories and Request for Productions of Documents. To date, Plaintiff has not been deposed nor have any of Plaintiff's co-workers. VWR is therefore unable to respond to that portion of the interrogatory.

Q2. Identify any documents, invoices, information stored in electronic form such as word processing files and computer databases, photographs, books, contracts, agreements,

drawings, approvals, delivery tickets, depositions of past or current employees, studies, memoranda, statements, your own pleadings, stipulations, promotional material, reports, telegrams and any other written, printed, graphic or audio materials of any kind or description, including all non-identical copies thereof, in your possession or control or in the possession and control of your local attorney(s), that indicate that any asbestos containing product manufactured, sold, delivered, shipped, rebranded, contracted for, distributed, installed or retailed by you your successor or predecessor entities, subdivision or affiliates were present at the sites specified in Question one.

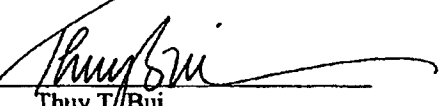
ANSWER

See VWR's answer to Interrogatory No. 1, which is incorporated herein.

DATED: New York, New York
February 8, 2007

DRINKER BIDDLE & REATH LLP

By:


Thuy T. Bui
140 Broadway
39th Floor
New York, NY 10005
(212) 248-3140
Attorneys for Defendant
VWR International, Inc.

TO: All parties on attached service list

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

CHRISTIAN F. HOLINKA,

Plaintiff,

-against-

A.W. CHESTERTON COMPANY, et. al.,

Defendants.

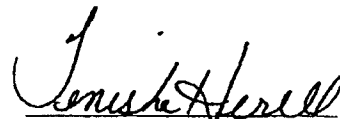
Index No. 06-114120

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Tenisha Herell, being duly sworn, deposes and says:

1. I am over the age of eighteen years, and am not a party to this action.
2. On the 8th day of February 2007, I served a true copy of the foregoing VWR International, Inc.'s Responses to Plaintiff's Product Identification Interrogatories and Document Requests by regular mail to all parties on the attached Service List that being their last known address, by depositing a copy in a postpaid properly addressed wrapper in an official depository under the exclusive care and custody of the U.S. Post Office within the State of New York.


TENISHA HERELL

Sworn to before me this
8th day of February, 2007


NOTARY PUBLIC

SFNY 107565v1

Linda Sussman
Notary Public, State of New York
No. 018U4902869
Qualified in Bronx County
Commission Expires Aug. 17, 2008

Christian F. Holinka Service List

Benjamin Darche, Esq. WEITZ & LUXENBERG, P.C. 180 Maiden Lane New York, New York 10038-4925 Attorneys for Plaintiffs	Julie Evans, Esq. Wilson, Elser, Moskowitz, Edelman & Dicker 150 East 42nd Street New York, NY 10017-5639 Phone # (212) 490-3000 Fax # (212) 490-3038 Counsel For A.W. Chesterton Co.
Judith Yavitz, Esq. Anderson, Kill, Olick & Oshinsky 1251 Avenue of the Americas New York, NY 10020-1000 Phone # (212) 278-1000 Fax # (212) 278-1733 Counsel for Amchem Products, Inc., n/k/a Rhone Poulenc Ag Co., n/k/a Bayer Cropscience Inc., and Certain Teed Corporation	Cori L. Leavitt, Esq. William Bradley, Esq. Joseph Carlisle, Esq. Mary Ellen Connor, Esq. Malaby, Carlisle & Bradley LLC 150 Broadway New York, NY 10038 Phone # (212) 791-0285 Fax # (212) 791-0286 Counsel for Aqua-Chem, Inc., CBS Corporation, a Delaware Corp., f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania Corp., f/k/a Westinghouse Electric Corp., Premier Refractories, Inc. f/k/a Adience/BMI and J.H. France Refractories Co.
Theodore Eder, Esq. Chris Gannon, Esq. Segal McCambridge Singer & Mahoney 830 Third Avenue, Suite 400 New York, NY 10022 Phone # (212) 651-7500 Fax # (212) 651-7499 Counsel for Anchor Packing Co., Inc., and Garlock Sealing Technologies LLC f/k/a Garlock, Inc.	Lawrence McGivney, Esq. Monakee Griffin, Esq. McGivney & Kluger, P.C. 80 Broad Street, 23 rd Floor New York, NY 10004 Phone # (212) 509-3456 Fax # (212) 509-4420 Counsel for Beckman Coulter, Inc.
Carol M. Tempesta, Esq. Marks, O'Neill, O'Brien & Courtney, P.C. 530 Saw Mill River Road Elmsford, NY 10523 Phone # (914) 345-3701 Fax # (914) 345-3743 Counsel for Corning Glass, k/n/a Corning Incorporated	Joseph Colao, Esq. Helen Chung, Esq. Leader & Berkon LLP 630 3 rd Avenue, 17 th Floor New York, NY 10017 Phone # (212) 486-2400 Fax # (212) 486-3099 Counsel for E.I. Dupont De Nemours and Company

<p>Steve Kevelson, Esq. One Cozine Avenue Brooklyn, NY 11201 Phone # (718) 649-4900 Fax # (718) 649-4902 Counsel for Empire Ace Insulation MFG. Corp.</p>	<p>Marc S. Gaffrey, Esq. Hoagland, Longo, Moran, Dunst & Doukas 40 Patterson Street P.O. Box 480 New Brunswick, NJ 08903 Phone # (732) 545-4717 Fax # (732) 545-4579 Counsel for Fisher Scientific International Inc.</p>
<p>Lisa M. Pascarella, Esq. Pehlivanian, Braaten & Pascarella, LLC 2430 Route 34 Manasquan, NJ 08736 Phone # (732) 528-8888 Fax # (732) 528-4445 Counsel for Ingersoll-Rand Co.</p>	<p>Andrew M. Johnson, Esq. Whiteman Osterman & Hanna LLP One Commerce Plaza Albany, NY 11260 Phone # (518) 487-7600 Fax # (518) 487-7777 Counsel for Kewaunee Scientific Corporation</p>
<p>Jennifer Darger, Esq. Vincent A. Errante, Jr., Esq. Darger & Errante LLP 116 East 27th Street, 12th Floor New York, NY 10016 Phone # (212) 452-5300/5303 Fax # (212) 452-5301 Counsel for Lennox Industries, Inc.</p>	<p>Linda Yassky, Esq. Sonnenschein Nath & Rosenthal 1221 Avenue of the Americas New York, NY 10020 Phone # (212) 398-5297 Fax # (212) 768-6800 Counsel for Rapid American Corporation</p>
<p>Ian Grodman, Esq. Law Offices of Ian R. Grodman, P.C. 515 Valley Street, Suite 170 Maplewood, NJ 07040 Phone # (973) 313-2424 Fax # (973) 313-9712 Counsel for Rheem Manufacturing Company, Inc., Individually and as successor to Rheem Manufacturing Company, as successor by merger to Civestco, Inc.</p>	<p>Jonathan E. Polonsky, Esq. Thelen Reid & Priest LLP 875 Third Avenue New York, NY 10022 Phone # (212) 603-2000 Fax # (212) 603-2001 Counsel for Univar USA Inc., Individually and as successor to Van Waters & Rogers Inc., Braun Chemical Company and Will Scientific, Inc.</p>

<p>John J. Zefutic, Jr., Esq. Greg A. Dadika, Esq. Reed Smith LLP 136 Main Street Princeton Forrestal Village Princeton, NJ 08540 Phone # (609) 987-0050 Fax # (609) 951-0824 Counsel for Manorcare Health Services, Inc., d/b/a Manor Care, Inc., individually and as successor to Precision-Cosmet Company, Inc., Central Scientific Company, a division of Cenco Incorporated; Central Scientific Company, a division of Cenco Instruments Corporation</p>	
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Exhibit G

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In Re: NEW YORK CITY ASBESTOS LITIGATION :

This Document Relates To:

CHRISTIAN F. HOLINKA,

Plaintiff

-against-

A.W. CHESTERTON COMPANY, et al.

Defendants.

Index No. 114120-06

: Univar USA Inc.'s Responses
: to Plaintiff's Product
: Identification Interrogatories
: And Document Requests

NOW COMES Defendant Univar USA Inc., by and through its attorneys, DRINKER
BIDDLE & REATH LLP, and in answer to Plaintiff's Product Identification Interrogatories And
Document Requests, states as follows:

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

Univar USA Inc. ("Univar" or "Defendant") has not fully completed its investigation or discovery relating to this action or its preparation for trial. All of the responses contained herein are based solely upon the information which is presently available and specifically known to Univar. The discovery in this matter is continuing and such further discovery may lead to additional responses in the future.

All the responses are given without prejudice to Univar's right to produce or introduce evidence of any subsequently discovered documents, facts, information, or contentions which it may later obtain or recall. Univar, therefore, reserves its right to supplement and/or amend any and all responses as additional facts and/or documents are discovered, analyses are made, and investigation and research is completed.

Each response herein is given subject to all appropriate objections, including but not limited to, competence, relevance, materiality, hearsay, lack of foundation, admissibility, form of the question, and the exclusion of any statement contained herein if any portion of the requests were asked for, or if any statement contained herein was made by, a witness present and testifying in Court. Such objections and grounds are therefore reserved and may be interposed at the time of trial. Univar reserves the right to make any evidentiary objections to the introduction

into evidence at trial of this case and otherwise of any of these responses or documents produced in response to the demands.

Univar objects to each and every interrogatory to the extent that it requires the disclosure of information that (a) was prepared in anticipation of litigation; (b) constitutes privileged attorney-client material; (c) constitutes attorney work product; (d) is subject to any other privilege; and/or (e) is otherwise protected from disclosure.

INTERROGATORIES

Q1. State if you are aware through information in your own files or in the possession of your local attorney(s), whether any asbestos containing product, sold, shipped, distributed, contracted for and/or manufactured by you was at the sites listed on the attached Chart A from Plaintiff's Answers to Defendant's Interrogatories and Request for Productions of Documents, and/or was present at the sites identified by the plaintiff or any of his co-workers at his/their depositions. For each site which you are aware that such products were present, specify the type of product and time frame in which such products were present.

ANSWER

Univar objects to this interrogatory as seeking information protected by the attorney-client and/or attorney work product doctrine. Subject to and without waiving its objections, Univar responds that after a diligent search and reasonable inquiry, Univar has no record or information that it supplied any asbestos-containing products to the sites listed on the attached Chart A from Plaintiff's Answers to Defendant's Interrogatories and Request for Productions of Documents. To date, Plaintiff has not been deposed nor have any of Plaintiff's co-workers. Univar is therefore unable to respond to that portion of the interrogatory.

Q2. Identify any documents, invoices, information stored in electronic form such as word processing files and computer databases, photographs, books, contracts, agreements,

drawings, approvals, delivery tickets, depositions of past or current employees, studies, memoranda, statements, your own pleadings, stipulations, promotional material, reports, telegrams and any other written, printed, graphic or audio materials of any kind or description, including all non-identical copies thereof, in your possession or control or in the possession and control of your local attorney(s), that indicate that any asbestos containing product manufactured, sold, delivered, shipped, rebranded, contracted for, distributed, installed or retailed by you your successor or predecessor entities, subdivision or affiliates were present at the sites specified in Question one.

ANSWER

See Univar's answer to Interrogatory No. 1, which is incorporated herein.

DATED: New York, New York
February 8, 2007

DRINKER BIDDLE & REATH LLP

By: 

Thuy T. Bui
140 Broadway
39th Floor
New York, NY 10005
(212) 248-3140
Attorneys for Defendant
Univar USA Inc.

To: All parties on attached service list.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

CHRISTIAN F. HOLINKA,

Plaintiff,

-against-

A.W. CHESTERTON COMPANY, et. al.,

Defendants.

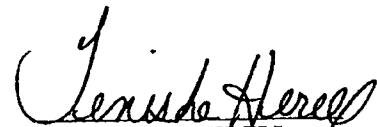
Index No. 06-114120

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Tenisha Herell, being duly sworn, deposes and says:

1. I am over the age of eighteen years, and am not a party to this action.
2. On the 8th day of February 2007, I served a true copy of the foregoing Univar USA Inc.'s Responses to Plaintiff's Product Identification Interrogatories and Document Requests by regular mail to all parties on the attached Service List that being their last known address, by depositing a copy in a postpaid properly addressed wrapper in an official depository under the exclusive care and custody of the U.S. Post Office within the State of New York.


TENISHA HERELL

Sworn to before me this
8th day of February, 2007


NOTARY PUBLIC

Linda Sussman
Notary Public, State of New York
No. 01SU4902889
Qualified in Bronx County
Commission Expires Aug. 17, 2009

SPNY 107564v1

Christian F. Holinka Service List

Benjamin Darche, Esq. WEITZ & LUXENBERG, P.C. 180 Maiden Lane New York, New York 10038-4925 Attorneys for Plaintiffs	Julie Evans, Esq. Wilson, Elser, Moskowitz, Edelman & Dicker 150 East 42nd Street New York, NY 10017-5639 Phone # (212) 490-3000 Fax # (212) 490-3038 Counsel For A.W. Chesterton Co.
Judith Yavitz, Esq. Anderson, Kill, Olick & Oshinsky 1251 Avenue of the Americas New York, NY 10020-1000 Phone # (212) 278-1000 Fax # (212) 278-1733 Counsel for Amchem Products, Inc., n/k/a Rhone Poulenc Ag Co., n/k/a Bayer Cropscience Inc., and Certain Teed Corporation	Cori L. Leavitt, Esq. William Bradley, Esq. Joseph Carlisle, Esq. Mary Ellen Connor, Esq. Malaby, Carlisle & Bradley LLC 150 Broadway New York, NY 10038 Phone # (212) 791-0285 Fax # (212) 791-0286 Counsel for Aqua-Chem, Inc., CBS Corporation, a Delaware Corp., f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania Corp., f/k/a Westinghouse Electric Corp., Premier Refractories, Inc. f/k/a Adience/BMI and J.H. France Refractories Co.
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